

In re:  
Timothy M. Cotter  
Melissa S. Cotter  
Debtors

Case No. 17-13357-amc  
Chapter 13

District/off: 0313-2  
Date Rcvd: Oct 26, 2022

User: admin  
Form ID: pdf900

Page 1 of 2  
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

**Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Oct 28, 2022:**

**Recip ID**                   **Recipient Name and Address**  
db/jdb                   + Timothy M. Cotter, Melissa S. Cotter, 216 S. 10th Street, Quakertown, PA 18951-1528

TOTAL: 1

**Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.**  
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

## NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Oct 28, 2022

Signature: /s/Gustava Winters

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## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on October 26, 2022 at the address(es) listed below:

Name	Email Address
BRIAN CRAIG NICHOLAS	on behalf of Creditor Freedom Mortgage Corporation bnicholas@kmllawgroup.com bkgroup@kmllawgroup.com
DENISE ELIZABETH CARLON	on behalf of Creditor Freedom Mortgage Corporation bkgroup@kmllawgroup.com
JEROME B. BLANK	on behalf of Creditor Freedom Mortgage Corporation jblank@avallonelaw.com
MARIO J. HANYON	on behalf of Creditor Freedom Mortgage Corporation wbefc@brockandscott.com mario.hanyon@brockandscott.com
PAUL H. YOUNG	on behalf of Debtor Timothy M. Cotter support@ymalaw.com ykaecf@gmail.com,paullawyers@gmail.com,pyoung@ymalaw.com;youngpr83562@notify.bestcase.com,tkennedy@ymalaw.com ,lesliebrown.paralegal@gmail.com

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PAUL H. YOUNG

on behalf of Joint Debtor Melissa S. Cotter support@ymalaw.com  
ykaecf@gmail.com,paullawyers@gmail.com,pyoung@ymalaw.com;youngpr83562@notify.bestcase.com,tkennedy@ymalaw.com  
,lesliebrown.paralegal@gmail.com

POLLY A. LANGDON

on behalf of Trustee FREDERICK L. REIGLE ecfmail@readingch13.com

POLLY A. LANGDON

on behalf of Trustee SCOTT F. WATERMAN (Chapter 13) ecfmail@readingch13.com

SCOTT F. WATERMAN (Chapter 13)

ECFMail@ReadingCh13.com

THOMAS SONG

on behalf of Creditor Freedom Mortgage Corporation tomysong0@gmail.com

United States Trustee

USTPRegion03.PH.ECF@usdoj.gov

TOTAL: 11

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Timothy M. Cotter Melissa S. Cotter	<u>Debtor(s)</u>	CHAPTER 13
FREEDOM MORTGAGE CORPORATION vs. vs.	<u>Movant</u>	NO. 17-13357 AMC
Timothy M. Cotter Melissa S. Cotter	<u>Debtor(s)</u>	11 U.S.C. Section 362
Scott F. Waterman	<u>Trustee</u>	

**STIPULATION**

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

1. The Order entered on August 23, 2022 granting relief from the automatic stay is vacated, and the automatic stay as to Secured Creditor and the Property located 216 South 10<sup>th</sup> Street, Quakertown, PA 18951 is in effect.

2. The post-petition arrearage on the mortgage held by the Secured Creditor on the Debtor's residence is **\$10,879.08**, which breaks down as follows:

Post-petition payments: April 2022 through October 2022 in the amount of \$1,700.24/month  
Suspense balance: (\$1,022.60)  
**Total Post-petition arrears: \$10,879.08**

3. The Debtor shall cure said arrearages in the following manner:

- Within seven (7) days of the filing of this Stipulation, Debtor shall make an immediate payment to the Secured Creditor in the amount of **\$10,879.08**.

4. Debtor shall maintain current monthly mortgage payments beginning with the November 1, 2022 payment and thereafter.

5. Should Debtor provide sufficient proof of payments made, but not credited

(front & back copies of cancelled checks and/or money orders), Movant shall adjust the account accordingly.

6. In the event the payments under Section 4 above are not tendered pursuant to the terms of this stipulation, Movant shall notify Debtor and Debtor's attorney of the default in writing and the Debtor may cure said default within FIFTEEN (15) days of the date of said notice. If Debtor should fail to cure the default within fifteen (15) days, Movant may file a Certification of Default with the Court and the Court shall enter an Order granting Movant immediate relief from the automatic stay and waiving the stay provided by Bankruptcy Rule 4001(a)(3).

7. If the case is converted to Chapter 7, Movant shall file a Certification of Default with the Court and the Court shall enter an order granting Movant relief from the automatic stay.

8. If the instant bankruptcy is terminated by either dismissal or discharge, this agreement shall be null and void, and is not binding upon the parties.

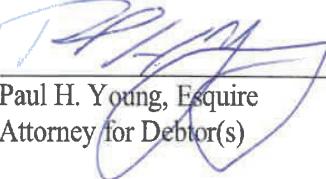
9. The provisions of this stipulation do not constitute a waiver by Movant of its right to seek reimbursement of any amounts not included in this stipulation, including fees and costs, due under the terms of the mortgage and applicable law.

10. The parties agree that a facsimile signature shall be considered an original signature.

Date: October 4, 2022

/s/ Denise Carlon, Esquire  
Denise Carlon, Esquire  
Attorney for Movant

Date: \_\_\_\_\_

  
\_\_\_\_\_  
Paul H. Young, Esquire  
Attorney for Debtor(s)

Date: 10/20/2022

/s/ Ann E. Swartz, Esquire for  
Scott F. Waterman, Esquire  
Chapter 13 Trustee

Approved by the Court this \_\_\_\_\_ day of \_\_\_\_\_, 2022. However, the court retains discretion regarding entry of any further order.

**Date: October 26, 2022**

  
\_\_\_\_\_  
Bankruptcy Judge  
Ashely M. Chan